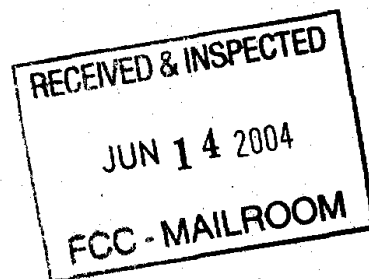


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June 11, 2004



Public
Radio
from
Fordham
University

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

RE: Further Notice of Proposed
Rulemaking on Digital Radio

MM Docket No. 99-325

Dear Ms. Dortch:

WFUV-FM, New York, is a noncommercial, educational radio station licensed to the Executive Committee of the Board of Trustees of Fordham University. The station offers a public radio service to the New York metropolitan area consisting of our signature *City Folk* music format, local and NPR news and Celtic and other specialty programming on weekends. WFUV is affiliated with National Public Radio and Public Radio International and is qualified to receive funding from the Corporation for Public Broadcasting ("CPB").

WFUV began broadcasting in HD Radio on May 28. In addition to providing superior audio quality, we are now anxious to maximize the public service potential of this exciting new technology. Among the most promising features of HD Radio is the potential to offer our listeners a second program service through a supplemental audio channel.

WFUV has begun to model various ways we might take advantage of a supplemental audio channel. For example, in addition to our *City Folk* format, our service includes segments devoted to University-based educational features, ten hours featuring Irish and Celtic music and heritage, Fordham basketball and football play-by-play and a number of specialty programs that fall outside the dominant music format. Each of these special programs brings meaningful material to a subsection of our audience but displaces listeners who prefer our regular music format. A supplemental audio channel could

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provide an ideal way to meet the demands of audiences having differing expectations of WFUV.

In addition, the supplemental audio channel would make it possible for the station to enhance and expand informational, educational and cultural services for a variety of purposes that would only be possible with a second channel to program.

Coincidentally, WFUV is rebuilding its office and studio facilities. We are already considering how this new plant can support more than one audio service.

Adopting rules providing for a supplemental audio channel can allow stations to double their public service capabilities with a minimum of expense and without encumbering additional spectrum. We therefore encourage the Commission to adopt rules making permanent the authority to multiplex supplemental audio channels on HD Radio.

Respectfully submitted,

Ralph M. Jennings
General Manager

